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June 17, 2022

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Clair Gjertsen & Weathers PLLC
4 New King Street, Suite 140
White Plains, New York 10604
Attention: Wendy Marie Weathers, Esq.

Re: Imogene Pearsons
Case #: 21-10471-CGM
Our Client: Leonel Lopez

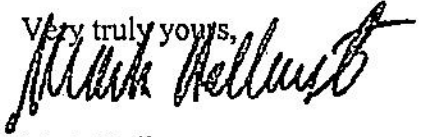
Dear Ms. Weathers:

This letter is responsive to your May 31, 2022 Notice of Motion for an Order Modifying Confirmed Chapter 13 Plan.

Annexed hereto is my May 27, 2022 email to your office which your office never responded to. As you may or may not know, prior to filing a judgment (see copy annexed) against Ms. Pearsons as a result of her defaulting on our settlement agreement (see copy annexed), I had requested her prior attorney, Jan V. Farensbach, Esq., to have Ms. Pearsons assign over her right of action against HSBC Bank to my client. Please see annexed my March 24, 2017 letter without enclosures elaborating as to the basis of Ms. Pearsons' having a claim against HSBC bank.

While Ms. Lopez's judgment versus your client may currently be stricken, it is my understanding that, per the bankruptcy law, if your client fails to abide by the terms of the bankruptcy plan, then the judgment could be reinstated. It is for this reason that I am submitting to your office for review the settlement stipulation that was previously offered to Ms. Pearsons' prior attorney but rejected at that time. Kindly advise, prior to the current June 30, 2022 Court appearance date at the Bankruptcy Court, whether or not your client is amenable to either my March 24, 2017 proposal or a variation thereof.

Thank you for your cooperation.

Very truly yours,

Mark Halberstam

MH/hr
Enclosures
Via First Class Mail and
Via email: info@cgwesq.com and
Via Fax (914) 472-1936 and
Via Efile